

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GRACE CALDWELL and LATONYA CALDWELL,)	
)	
)	
Plaintiffs,)	08 C 710
)	
v.)	
)	Judge Kocoras
CITY OF CHICAGO, et al.,)	
)	Magistrate Judge Ashman
Defendants.)	

**CITY OF CHICAGO’S AGREED MOTION TO EXTEND
THE TIME IN WHICH TO ANSWER OR OTHERWISE PLEAD**

Defendant City of Chicago (“City”), by Mara S. Georges, Corporation Counsel for the City of Chicago, respectfully requests that this Honorable Court grant an extension of time up to and including April 29, 2008 in which to answer or otherwise plead to Plaintiff’s Complaint at Law. In support of this agreed motion, the City states as follows:

1. On February 1, 2008, Plaintiffs filed their Complaint in the Northern District of Illinois, Eastern Division, which includes claims brought pursuant to 42 U.C.S. § 1983 alleging violations of Plaintiffs’ constitutional rights.
2. On March 31, 2008 undersigned counsel was assigned to represent the City of Chicago and filed her appearance the same day (service of summons was issued as to the City on March 19th).
3. As undersigned defense counsel has only recently been assigned to defend this case, she now requests additional time to answer as she must examine the file, confer with her client and draft an answer or otherwise plead to Plaintiff’s Complaint.
4. Undersigned counsel has conferred with Plaintiff’s counsel, Mr. Garrett Browne,

who has no objection to this request and who has agreed to this motion.

5. This motion is the City's first request for an extension of time to answer or otherwise plead. Such a request will not unduly delay the resolution of the disputed issues, nor will it prejudice the plaintiff.

WHEREFORE, Defendant City of Chicago, respectfully requests that it be given until April 29, 2008 to answer or otherwise plead to Plaintiff's Complaint at Law.

Respectfully submitted,

MARA S. GEORGES
CORPORATION COUNSEL

BY: /s/ Ashley C. Kosztia
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